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UNITED STATES DISTRICT COURT DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, et al.,

Debtors.¹

PROMESA Title III

No. 17 BK 3283-LTS

(Jointly Administered)

DECLARATION OF ROBERTO C. QUIÑONES-RIVERA IN SUPPORT OF JOINT LIMITED OBJECTION OF BANK DEFENDANTS TO URGENT MOTION OF THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD OF PUERTO RICO TO ENFORCE ORDER UNDER BANKRUPTCY RULES 1007(i) AND 2004 AUTHORIZING DISCOVERY AND COMPELLING DISCLOSURE OF LISTS OF SECURITY HOLDERS

¹ The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

Roberto C. Quiñones-Rivera declares under penalty of perjury as follows:

- 1. I am a capital member of the law firm of McConnell Valdés LLC, which maintains an office at 270 Muños Rivera Avenue, Hato Rey, Puerto Rico 00918.
- 2. I submit this Declaration in support of the Joint Limited Objection of Bank

 Defendants to Urgent Motion of the Financial Oversight and Management Board of Puerto Rico

 To Enforce Order Under Bankruptcy Rules 1007(i) and 2004 Authorizing Discovery and

 Compelling Disclosure of Lists of Security Holders (the "Limited Objection"), filed

 contemporaneously herewith.
- 3. Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Limited Objection.
 - 4. Attached hereto as **Exhibit A** is the Bank Defendants' Proposed Order.
- 5. Attached hereto as **Exhibit B** is a redline showing the proposed changes between the SCC Proposed Order and the Bank Defendants' Proposed Order.
- 6. Attached hereto as **Exhibit C** is a true and correct copy of an e-mail sent by counsel to the SCC to counsel for certain of the Bank Defendants, dated May 8, 2019.
- 7. Attached hereto as **Exhibit D** is a true and correct copy of a Notice of Service of Process from CSC, attaching the Informative Motion, dated May 1, 2019.
- 8. Attached hereto as **Exhibit E** is a true and correct copy of a Service of Process Transmittal from CT Corporation, attaching the Informative Motion, dated April 30, 2019.

Pursuant to 28 U.S.C. § 1746, I, the undersigned, declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed this 10th day of May, 2019. San Juan, Puerto Rico

/s/ Roberto C. Quiñones-Rivera
Roberto C. Quiñones-Rivera, Esq.